

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

Case No. 1:22-cr-20156-KMM-1

UNITED STATES OF AMERICA,

v.

STERICYCLE, INC.,

Defendant.

ORDER OF DISMISSAL

THIS CAUSE is before the Court upon the Government's Unopposed Motion to Dismiss Information (ECF No. 21) filed in the above-captioned case against Defendant Stericycle, Inc. ("Stericycle"), pursuant to Federal Rule of Criminal Procedure 48(a). Therein, the Government moves to dismiss the Information with prejudice because Stericycle has fully complied with all of its obligations under the Parties' Deferred Prosecution Agreement ("DPA"). *See generally id.*

On April 14, 2022, the Government filed a criminal two-count Information charging Stericycle with conspiracy to commit offenses against the United States in violation of 18 U.S.C. §§ 371, 3551 *et seq.* and 15 U.S.C. 78m(b)(2)(A), 78m(b)(5), and 78ff(a). *Id.* at 1; *see* (ECF No. 1). In Count One, Stericycle was charged with conspiracy to violate the antibribery provisions of the Foreign Corrupt Practices Act of 1977 ("FCPA"), as amended, 15 U.S.C. §§ 78dd-1(a). *Id.* In Count Two, Stericycle was charged with conspiracy to violate the Accounting Provisions of the FCPA, 15 U.S.C. §§ 78m(b)(2)(A), (b)(5), and 78ff(a). *Id.* On April 18, 2022, the Government entered into the DPA with Stericycle, in which the Government deferred prosecution of Stericycle for a period beginning on the date the Information was filed and ending three years from the later of the date on which the Information was filed or the date on which the independent compliance

monitor was retained. *Id.* at 1-2; *see* (ECF No. 14).


Pursuant to the DPA, Stericycle was required to cooperate with the Government's investigation and to agree to the imposition of an independent compliance monitor. *Id.* at 2. Stericycle was also required to pay a total criminal monetary penalty of \$52,500,000. *Id.* Now, in the instant Motion, the Government states that:

Stericycle has fully met its disclosure obligations under the DPA, including full cooperation with the Government, implementation of an enhanced compliance program and procedures, and satisfaction of the terms of the provisions regarding self-reporting. Stericycle has also made significant changes to its business model to reduce its anticorruption risk profile, which greatly reduced the likelihood of recurrence of the misconduct charged in the Information. In addition, on or about April 29, 2022, and April 20, 2023, Stericycle made timely payments totaling a \$40,834,995 criminal monetary penalty, the full amount due after application of credit for certain payments to Brazilian law enforcement, as provided in the DPA.

Id. at 2-3.

Accordingly, UPON CONSIDERATION of the Motion, the pertinent portions of the record, and being otherwise fully advised in the premises, it is hereby ORDERED AND ADJUDGED that the Government's Unopposed Motion to Dismiss Information (ECF No. 21) is GRANTED. The Information (ECF No. 1) is DISMISSED WITH PREJUDICE.

DONE AND ORDERED in Chambers at Miami, Florida, this 25th day of April, 2025.



K. MICHAEL MOORE

UNITED STATES DISTRICT JUDGE

c: All counsel of record.